

From: "[REDACTED]" <[REDACTED]>
To: "[REDACTED] (USANYS)" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>
Cc: "[REDACTED] (USANYS)" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>, "[REDACTED] (USANYS) 1" <[REDACTED]>
Subject: RE: Disparities in Counsel and Discovery Access for Ghislaine Maxwell and Justin Rivera
Date: Mon, 21 Dec 2020 21:55:26 +0000

Yes, I highlighted the huge volume of discovery for Maxwell when I spoke with [REDACTED] this morning. That volume was a significant driver in our team's decision to request that she receive so much time to review her discovery. Based on my read of the transcript from this morning's Rivera conference, it sounds like Rivera is not even using all the time he has now. By contrast, my understanding is that Maxwell is using up the full time she has been given.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Monday, December 21, 2020 4:47 PM
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) 1 <[REDACTED]>
Subject: RE: Disparities in Counsel and Discovery Access for Ghislaine Maxwell and Justin Rivera

I'd also look into potential differences in the volume of discovery. No idea what your case entails, [REDACTED], but in Maxwell we have produced truly enormous volumes of material (we seized 60 some devices during the investigation, for example, in addition to an entire FBI file from the prior Florida investigation...) that may explain some of this.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Monday, December 21, 2020 4:42 PM
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) 1 <[REDACTED]>
Subject: RE: Disparities in Counsel and Discovery Access for Ghislaine Maxwell and Justin Rivera

Thanks, [REDACTED]. Can you keep me posted on what we think will be the substance of the draft declaration when you know (that is, before we are submitting anything on 12/31)? And how much of this is attributable to differences between MCC and MDC, as well as specific differences in their housing situations?

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Monday, December 21, 2020 4:35 PM

Review of electronic discovery (NB: each defendant has laptop access)	13 hours per day/7 days per week (91 hours total)	3 hours per day/7 days per week (21 hours total)
Counsel visits (by video)	3 hours per day/5 days per week (15 hours total)	Four hours per week (plus an additional two hours scheduled through the Federal Defenders) (6 hours total)
Weekend legal calls	As needed	Not available

The declaration is due by December 31. Because Judge Engelmayer's request implicates at least two criminal cases, and potentially the ongoing civil litigation with the MCC, we wanted to make sure that you were all aware of this issue. We are also happy to set up a call to discuss this further. In the meantime, we are working with [REDACTED] to identify the appropriate declarant and draft an explanation for the Court.

Best,

[REDACTED]

[REDACTED] [REDACTED]

Assistant United States Attorney
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New York, NY 10007
Tel: [REDACTED]
[REDACTED]